

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167  
Chapter 7

Debtor.

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Erik A. Ahlgren, as Chapter 7 Trustee  
of the Bankruptcy Estate of Pro-Mark Services, Inc.,  
as Administrator of the Pro-Mark  
Services, Inc. Employee Stock Ownership Plan, and  
as Trustee of the Pro-Mark Services, Inc.  
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable  
Living Trust, Kyle R. Berg Revocable Living Trust,  
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

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**STIPULATED MOTION TO FURTHER EXTEND  
RESPONSE DEADLINE TO FACILITATE PENDING SETTLEMENT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his Adversary Complaint against the Defendants, including Defendant Mandy Grant, on August 26, 2024. [ECF Nos. 1, 2.] Plaintiff filed an Amended Complaint on September 25, 2024 (the "Amended Complaint"). [ECF No. 11.]

2. On January 20, 2025, Defendant Grant filed a Motion to Dismiss the Amended Complaint (the “Motion to Dismiss”). [ECF Nos. 72, 75.] Plaintiff’s original response deadline was February 12, 2025. [ECF Nos. 78, 79.]

3. Plaintiff and Defendant Grant have reached a tentative settlement of Plaintiff’s claims against Defendant Grant, subject to a definitive and final signed settlement agreement and Court approval.

4. By order dated February 11, 2025 [ECF No. 88], and pursuant to a stipulated motion filed by Plaintiff and Defendant Grant, the Court extended Plaintiff’s response deadline to March 12, 2025, to facilitate the parties’ finalization and documentation of such settlement and obtaining Court approval.

5. Plaintiff and Defendant Grant continue to work diligently on finalizing the pending settlement. To further facilitate such efforts, Plaintiff and Defendant Grant hereby move the Court, by stipulation, for an order extending the deadline for Plaintiff to respond to the Motion to Dismiss to April 12, 2025.

Dated: March 12, 2025

/e/ Peter D. Kieselbach

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Peter D. Kieselbach (*Admitted Pro Hac Vice*)  
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Counsel for Plaintiff

Dated: March 12, 2025

/e/ Brian D. Larson

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